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IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

16-CV-00413 JR

OMARI TAHIR aka, JAMES C. GARRETT

Plaintiff,

Case No.:

- vs. -

CIVIL COMPLAINT FOR DAMAGES
AND INJUNCTIVE RELIEF

KSHAMA SAWANT, Seattle City Council in her
official capacity as Chairwoman of the Seattle
City Light; SEATTLE CITY LIGHT
MARGARET DELANEY, individually, and in
her official capacity as Managing Director of
Midtown Limited Partners;; BRUCE
HARRELL, individually and in his official
capacity as President of the City of Seattle
Council; MIDTOWN LIMITED PARTNERS
Defendants.

INTRODUCTION

1. This action is for declaratory and injunctive relief, punitive and compensatory damages by the Plaintiff for violation of first amendment constitutional rights to grieve government and retaliation for grieving government by filing a cause of action before the federal district courts against defendants, and racially harass Plaintiff for his Black community activism, by and through, municipal government official actors in concert with private actors to contrived against plaintiff by disconnecting utilities services by the Defendants, moreover, seeking damages for property caretaker for eight years in exchange for equity position on the sell and purchase of real estate property. The Defendant's actions were based upon defendant's strong racial hostility.

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1 DEFENDANTS MONICA DOE, CATHY DOE, EMILIE DOE, as well as John and Jane Doe
2 officials, employees, and supervisors of the SEATTLE PUBLIC SCHOOL DISTRICT and other,
3 advised the individual Defendants and/or failed to properly train, supervise, or discipline.

4 9. Defendant City of Seattle is a government entity in KING COUNTY, WASHINGTON
5 governed and functioning under the laws of the State of Washington. It employs DEFENDANTS
6 COUNCILWOMAN KSHAMA SAWANT and COUNCILMAN BRUCE HARRELL officials,
7 employees, and supervisors of the SEATTLE CITY LIGHT and other, advised the individual
8 Defendants and/or failed to properly train, supervise, or discipline.

9 10. Plaintiff does not know the true names of all the defendants and all persons unknown,
10 claiming any legal or equitable right, title, estate, lien, or interest in the property described in the
11 complaint adverse to plaintiff's title or any cloud on plaintiff's title thereto and DOES 1 through
12 10, inclusive, and therefore sues them by those fictitious names. The names, capacities and
13 relationships of DOES 1 through 10 will be alleged by amendment to this complaint when they
14 are known.

15 11. Plaintiff is informed and believes and on that basis alleges that each of the DOE
16 defendants claims, or may claim, some interest in the real property described in paragraph 4 of
17 this complaint.

18 SUMMARY OF FACTS

19 12. Plaintiff is an Seattle City Light customer at real property located in King County,
20 Washington and more specifically described as: Resident Parcel No.: 721740-0809, legal
21 description Rengstorffs J H. Add, Plat Block: 6, Plat Lot 13-14, Address: 2314 East Spring Street
22 Seattle, Washington 98122.

23 13. Plaintiff has maintained possession of all real property as city light customer
24 described in paragraph 4 of this complaint, by and through, Tom Bangasser, Managing Partner,
25 of Midtown Limited Partnership, and has maintain continuous and exclusive possession.

26 14. Plaintiff's occupant possession has been actual, open, continuous, and exclusive since
27 June, 2007, in excess of the 8-year period set forth in Revised Code Washington Chapter 7.28.
28

1 15. Plaintiff has been in possession of the real property described in paragraph 4 of this
2 complaint by virtue of residing and maintenance repairs since year of 2007.

3 16. Plaintiff has been in continuous possession during the 8-year period described in
4 paragraph 6 of this complaint, adverse to defendant Delany and to all other persons, in support of
5 plaintiff's title to the real property and as curative of any defects in the verbal agreements and
6 current tenets residing at the above location.

7 17. Defendant Delany claim an estate or interest in the real property described that is
8 racially adverse to plaintiff.

9 18. Since 2007 Plaintiff has paid the Seattle City Light Bills for the property in
10 paragraph six and in October 2015 over paid light bill \$7and never received another light bill. On
11 the 29th day of February, 2016, Plaintiff received a discontinued of services notice placed on the
12 door, thereafter Plaintiff immediately called Seattle City Light and found out that defendant
13 DeLany had Plaintiff's Light Bills diverted to defendant Midtown 1152-23rd ave. Seattle address,
14 moreover, the defendant's added themselves to the Seattle City Light Bills without consent of the
15 plaintiff and allowed the bill to skyrocket during a period of Oct 2015 to March 2016.

16 19. Defendant Does and Seattle City Light allowed defendants Delany and Midtown to
17 be added to plaintiff's City Light Bill for the sole purpose to racially harass and in retaliation for
18 plaintiff's political activism and pending federal litigation against the defendant Delany.

19 20. The municipal government officials, each of them, and in concert with private actors,
20 uses utility companies such as defendant Seattle City Light for the sole purpose to oppress,
21 suppress Seattle's Black community activism against gentrification, vote dilution, police
22 brutality, cultural awareness, discriminatory practices in federal financial programs, by and
23 through, disconnecting utilities such as water and lights, etc. City of Seattle elected officials.
24 Seattle Police Department and Seattle City Light Agents have unlawfully cut off the lights and
25 water for political purposes on plaintiff at the following address AFRICAN AMERICAN
26 HERITAGE MUSEUM AND CULTURAL CENTER, 2300 South Massachusetts, AFRICAN
27 AMERICAN HERITAGE MUSEUM AND CULTURAL CENTER, 918 Martin Luther King
28

1 South, AFRICAN AMERICAN HERITAGE MUSEUM AND CULTURAL CENTER /
2 AFRICATOWN INNOVATION CENTER at HORACE MANN BUILDING 2400 and East
3 Cherry, AFRICAN AMERICAN HERITAGE MUSEUM AND CULTURAL CENTER /
4 UMOJA FEST PEACE CENTER / GARDEN 2314 East Spring St. PLAINTIFF was recognize
5 occupant at each of these locations with legal tenancy rights when both electricity and light
6 utilities were shut off due to ON INSTITUTIONALIZED WHITE RACISM embedded in Seattle
7 City government, Seattle City Light, Seattle Water Dept., Seattle Police Dept., Seattle Public
8 Schools and American political / social culture in general (SEE KERNER REPORT ON CIVIL
9 DISORDER). This evidence can be supported by the City of Seattle Mayor Murray's State of the
10 City declaration that "RACISM IS THE NUMBER ONE ISSUE IN SEATTLE".

11 21. The acts complained herein above by the defendants with informed knowledge of
12 the DISABLED, US MILITARY VETERAN STATUS. Each of them, has caused the utilities to
13 be shut off on DISABLED plaintiff COVERED UNDER THE AMERICAN WITH
14 DISABILITIES ACT (ADA) and are the latest of many ongoing unlawful discriminatory acts of
15 Defendants, Seattle City government agencies, wealthy white developers in furtherance of their
16 UNCONSTITUTIONAL ACTS TO ELIMINATE THE VOTING STRENGTH OF
17 AFRICATOWN RESIDENCE IN ORDER TO POLITICALLY, CULTURALLY AND
18 ECONOMICALLY DISENFRANCHISE SEATTLE'S AFRICAN AMERICAN COMMUNITY
19 (AFRICATOWN / CD), POLITICALLY, CULTURALLY AND ECONOMICALLY (GENTRIFICATION
20 / ECONOMIC ETHNIC CLEANSING), WHILE EMPOWERING AND RECOGNIZING ASIAN
21 AMERICANS IN SEATTLE'S "CHINATOWN / INTERNATIONAL DISTRICT".

22 CAUSE OF ACTION

23 22. The Plaintiff realleges each of the allegations set forth in paragraphs 1-21 above and
24 by this reference, incorporates each such allegation herein as if set forth in full.

25 23. The defendants, each of them, received federal financial assistance in acquiring real-
26 estate property and financially improving their real-estate investment, by and through, expanding
27 their ownership of more property through minority community federal financial economic
28 programs.

1 24. The defendants, each of them, underhandedly and secretly, shut off the utilities by
2 engaging in conspiracy to hide City Light Bill from Plaintiff to be accumulate to obsessive
3 amount, then demanding immediate unreasonable large unfordable lump sum payment
4 unfordable to Plaintiff. Plaintiff subsequently made \$200 payment and received next City Light
5 Bill due on March 2, 2016, the same day City Light cut service without Plaintiffs prior
6 knowledge. Moreover, Defendants are engaging in a conspiracy to DEMOLISH building
7 Plaintiff resides in currently with the WATER AND ELECTRICITY UNLAWFULLY CUT OFF.
8 In addition Defendants unlawfully added with out Plaintiff knowledge or consent, defendant
9 Delany and Midtown Limited Partnership to the utilities statements for the sole purpose to harass
10 and retaliate against the plaintiff and to have the utilities cut off for the sole purpose of removing
11 the Black tenants from the property.

12 25. In addition, with respect to all of the claims for relief asserted in this Complaint, and
13 for all of the reasons asserted herein, there is an actual controversy between Plaintiffs and 11
14 Defendants sufficient for a declaratory judgment pursuant to 28 U.S.C. §§ 2201 and 2202.

15 26. Accordingly, Plaintiff is entitled to preliminary and permanent injunctive relief and
16 declaratory relief restraining Defendants from the sell of property without just compensation and
17 declaring the above acts by the defendants to be unlawful.

18 27. Plaintiff alleges and realleges that the defendants, each of them, are engaging in
19 ethnic cleansing of Seattle's Central District, by and through, gentrification, oppressing and
20 suppressing Black Culture, denouncing black historical sites, demolishing buildings occupied by
21 grassroots Black activist for the sole purpose of replacing black citizens with white citizens. For
22 example, demolishing the Black historical Liberty Bank site thereafter replacing it with schedule
23 one drug store in violation of the federal controlled substance act.

24 28. Further, like other municipal corporate government entities, defendant City of Seattle
25 only funds organizations like the Urban League, which is a subsidiary corporation of
26 metropolitan city of Seattle, as the spokesperson for the entire Black Community, in exchange
27 for political votes and political payoffs, by and through, federal financial grants and loans, which
28 never result in established, development and independent self reliant institutions/ businesses.

1 **PRAYER FOR RELIEF**

2 **WHEREFORE**, plaintiff demands judgment against defendants as follows:

3 1. For judgment that defendant pay the sum of \$12,000.00 per year for the eight years as
4 caretaker, with treble damages;

5 2. For judgment that defendant Delany pay the sum of \$5.5 Million for racially harassing
6 Plaintiff;

7 3. For judgment that Defendant Delany pay plaintiff the sum of \$100,000.00 for
8 defamation of character.

9 4. For such further relief as the court may deem proper.

10 **DATED this 21st day of March, 2016.**

11
12 Respectfully submitted,

13
14 Omari Tahir
15 Private Attorney General

16 **VERIFICATION**

17 I, Omari Tahir Garrett, am a Plaintiff in the above-entitled action. I have read the
18 foregoing complaint and know the contents thereof. The same is true of my own knowledge,
19 except as to those matters which are therein alleged on information and belief, and as to those
20 matters, I believe it to be true.

21 I declare under penalty of perjury that the foregoing is true and correct and that this
22 declaration was executed at Seattle, Washington.

23 **DATED this 21st day of March, 2016.**

24
25 Respectfully submitted,

26 

27 **Omari Tahir Garrett**
28 **Private Attorney General**